

Policy for the Prevention of Conflicts of Interest

Alpha Capital Partners Group Company Limited

The Board of Directors of Alpha Capital Partners Group Company Limited (the 'Company') issues this Policy for the Prevention of Conflicts of Interest based on the principle that the decisions of entering into any transactions must be conducted in the best interests of the Company and its shareholders. All actions with possible conflicts of interest with those of the Company and its subsidiaries shall be avoided.

All parties who are involved in or have interests in business transactions being considered shall notify the Company of the nature of their involvement or their interests in the transactions and shall not participate in the consideration or have any authority in the approval of the transaction. Actions that could have possible conflicts of interest shall include the following:

1. Directors, executives and employees of the Company shall refrain from conducting business, either directly or indirectly, that is of a similar nature to and/or in competition with the business of the Company or its subsidiaries, either for their own benefit or for others' which may cause damage to the Company or its subsidiaries, or entering into a partnership with or acquiring the status of a shareholder with decision-making power or an executive in a business that competes with or is of a similar nature to that of the Company or its subsidiaries unless they can demonstrate that a mechanism is put in place to ensure that the transaction will not cause any damage to the Company or its subsidiaries, and measures are also put in place to ensure the best interests of the Company and its shareholders in general.
2. In accordance with the provisions under the Public Limited Company Act B.E. 2535 (as amended) and the relevant notification under the Securities and Exchange Act B.E.2535 (as amended), directors, executives and employees of the Company shall disclose information about their personal business or business of their family members or relatives or dependents which may result in conflicts of interest with those of the Company or its subsidiaries. Such businesses to be disclosed include, for example:
 - Investments in or benefits to be obtained from business partners or customers of the Company or its subsidiaries;
 - Any positions held in or consultancy for business partners or customers of the Company or its subsidiaries;
 - Having services with the Company or its affiliates, either directly or indirectly through other third parties.

3. Directors, executives, and employees shall not use confidential information of the Company or its subsidiaries such as work plans, revenue, resolutions, business estimations, work products from research or price bidding for their own benefits or for others' benefit, irrespective of whether such use of confidential information would cause damage to the Company or its subsidiaries. Directors, executives, and employees are required to strictly comply with the Policy for the Use of Inside Information.
4. Directors, executives, and employees shall refrain from holding shares in the competitors of the Company or its subsidiaries to the extent where such shareholding is material, thus causing the directors, executives and employees to fail to act in accordance with their duties or causing any impact on the discharge of their duties. Any shareholding acquired by directors, executives and employees prior to them becoming a director, executive or employee, or before the Company or its subsidiaries have engaged in the business, or shareholding that is acquired as an estate shall be notified to their supervisor immediately
5. Directors, executives, and related persons shall ensure that the Company has complied with the requirements and methods of disclosure of information on related party transactions in accordance with the law or with the requirements of relevant regulatory authorities and in line with the rules and regulations of the Company.
6. Directors, executives, and employees shall refrain from entering into related party transactions among themselves or with related persons/ juristic persons which would cause possible conflicts of interest with those of the Company or its subsidiaries.
7. If related party transactions are not entered into on general commercial terms in accordance with the principles approved by the Board of Directors, or where the nature and size of the transaction is not within the authority of the management to approve, such transactions shall be reviewed and are subject to the opinion of the Audit Committee before they can be proposed to the Board of Directors or the general meeting of shareholders for approval.
8. If it is necessary to enter into a related party transaction, the transaction shall be on general commercial terms in accordance with the principles approved by the Board of Directors, which shall be transparent and fair as would have been entered into with third parties taking into consideration the best interests of the Company.
9. Directors, executives, and employees shall strictly comply with the Policy for the Use of Inside Information. It is the policy of the Company to put in place an organizational structure where there is a separation of work and responsibilities among work units and employees whose duties, responsibilities or nature would give rise to possible conflicts of interest.

10. Interested parties shall not be involved in the consideration of transactions in which they have any conflicts of interest.
11. Board of Directors shall govern the Company and its subsidiaries to comply with the securities laws and other relevant laws as well as disclosure of information of the Company and its subsidiaries in accordance with the regulations of the Stock Exchange of Thailand and other related agencies.

The Board of Directors considered and approved this Policy for the Prevention of Conflict of Interests in the Board of Directors meeting No. No. 7/2022, which was held on 4 November 2022. This Policy for the Prevention of Conflict of Interests shall come into force as from 4 November 2022.

A handwritten signature in black ink, appearing to read 'M. Nacson', is written over a horizontal dashed line. The signature is fluid and cursive.

(Mr. Christopher Michael Nacson)

Chairman of the Board of Directors

Alpha Capital Partners Group Company Limited